Ms. AnnMarie Miller

"Report of the International Workshop on In Vitro Methods for Assessing Acute Systemic Toxicity"

Dr. William S. Stokes
Director, NICEATM (MD EC – 17)
National Institute of Environmental Health Sciences
P.O. Box 1223
Research Triangle Park, NC 27709

October 19, 2001

Dear Dr. Stokes:

I am writing in an effort to end lethal animal-poisoning tests. Animal tests have never been proved to be scientifically reliable, reproductive or relevant to humans. In fact, one top scientist at the NIEHS workshop even stated that the lethal poisoning tests on rats aren't even relevant to rats, let alone people. These tests are not only cruel, they are virtually irrelevant to humans producing inaccurate and misleading results in almost half the cases, whereas the non-animal cell culture tests have been found to be highly predictive of chemical toxicity in humans.

Therefore, I strongly urge that the NIEHS should adopt the new non-animal test methods **IMMEDIATELY**. The non-animal test methods have been considered for almost 20 years, and animals should not continue to suffer and die because of bureaucratic inertia. Also, NIEHS recommends using the non-animal method to set the starting dose for further animal-poisoning tests. While this may reduce the number of animals killed in acute poisoning studies, it does not go far enough. Government agencies should use in vitro cell culture tests to **COMPLETELY REPLACE** the use of animals in lethal dose tests. Furthermore, at a minimum, **ALL** government agencies that currently require the acute animal-poisoning studies should **IMMEDIATELY** incorporate the in vitro cell culture method as a transitional means of reducing the number of animals killed and should fully support the use of this method as an eventual **REPLACEMENT** for lethal-dose poisoning studies. In particular, the EPA must immediately incorporate the non-animal cell culture method into its HPV chemical program, as promised in its **October 1999 agreement with the animal protection community**.

Sincerely,

AnnMarie Miller